

In re:  
WALLACE, Jacqueline  
SSN xxx xx 7798

Debtor

Chapter 13  
Case No. 13-11040-WCH

**TRUSTEE'S OBJECTION TO CONFIRMATION OF  
DEBTOR'S CHAPTER 13 PLAN**

Now comes Carolyn A Bankowski, Standing Chapter 13 Trustee ("Trustee"), and respectfully objects to confirmation of the Debtor's Chapter 13 Plan, and as reasons therefore states as follows:

1. On February 27, 2013, the Debtor filed this Chapter 13 Case. On April 2, 2013, the Debtor appeared for a meeting of creditors and was sworn.
2. The Trustee has filed an objection to the claim of exemptions. If the objection to exemptions is sustained, the Debtor has additional non-exempt assets that must be made available to unsecured creditors.
3. Therefore, the Debtor's proposed Plan cannot be confirmed, as the Plan does not meet the best interest test of 11 U.S.C. §1325 (a)(4).

WHEREFORE, the Trustee requests that the Court sustain her objection to confirmation of the Debtor's Chapter 13 Plan, and for such other relief as is proper.

Dated: April 9, 2013

Respectfully submitted,  
Carolyn Bankowski  
Standing Chapter 13 Trustee  
/s/ Carolyn Bankowski

Carolyn Bankowski BBO# 631056  
Patricia A. Remer BBO# 639594  
Office of the Chapter 13 Trustee  
P.O. Box 8250  
Boston, MA 02114  
(617) 723-1313

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**Certificate of Service**

The undersigned hereby certifies that on April 9, 2013, a copy of the Trustee's Objection to Confirmation of Debtor's Chapter 13 Plan was served via first class mail, postage prepaid, or by electronic notice, on the debtor and debtor's counsel at the addresses set forth below.

Jacqueline Wallace  
540 Beech Street  
Roslindale, MA 02131

Angelina Bruce-Flounory  
Law Office of Angelina A. Bruce-Flounory  
P.O. Box 870120  
Milton, MA 02187

Respectfully submitted,  
Carolyn Bankowski  
Standing Chapter 13 Trustee

/s/ Carolyn Bankowski

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